

From: Ulysses T. Ware

To: The Hon. William H. Pauley, III and the Office of the District Clerk (SDNY)

Date: June 30, 2021

RE: Filing the enclosed pleadings on the 05cr1115 (SDNY) dockets.

Office of the District Clerk (SDNY) and Judge Pauley:

Please file the enclosed **pleading** and please properly and correctly identify the enclosed as a pleading rather than a "letter":

Dispositive Undisclosed Material Brady Exculpatory Evidence Concealed and Suppress by District Judge William H. Pauley, III while Colluding and Conspiring with the USAO and SEC's Lawyers.

on the applicable dockets.

In the future, please serve Mr. Ware via email at utware007@gmail.com with a copy of the Government's filings, as well as all of your orders or directives entered in this matter, due to the slowness of the U.S. Mail.

Paper copy to follow via U.S. Mail.


/s/ Ulysses T. Ware

Case Nos. 05cr1115 (SDNY) (#31)

Submitted on June 30, 2021, by email to: PauleyNYSDChambers@nysd.uscourts.gov

Jonathan_mccann@nysd.uscourts.gov

Ulysses T. Ware

/s/ Ulysses T. Ware

Ulysses T. Ware, individually, and as
the legal representative for the estate
of third-party surety Mary S. Ware.

123 Linden Blvd.

Suite 9-L

Brooklyn, NY 11226

(718) 844-1260 phone

utware007@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

United States of America, et al.,

Plaintiff, Petitioner,

Cross Respondent,

v.

Ulysses T. Ware, et al.,

Defendant, Respondent,

And Cross Petitioner.

**Re: Dispositive Undisclosed Material Brady Exculpatory Evidence Concealed and Suppress by
District Judge William H. Pauley, III while Colluding and Conspiring with the USAO and SEC's
Lawyers.**

Certificate of Service

I Ulysses T. Ware certify that I have this 30th day of June 2021 served the persons listed below with a
copy of this pleading:

AUSA Jeffrey R. Ragsdale, Counsel DOJ's Office of Professional Responsibility

AUSA Melissa Childs

AUSA John M. McEnany

Acting USA Audrey Strauss

USAG The Hon. Merrick Garland

Exhibit #19 to June 26, 2021, Supp. #1. Material Undisclosed Brady Exculpatory Evidence

¶21

The USAO and the SEC bribed Judge Pauley for the entry of the Barasch Bribe Order to intentionally violate Mr. Ware's Fifth and Sixth Amendment rights to "present a complete defense" by offering at trial in 1115 the live testimony of the "SEC's Lawyers" (Barasch, Webster, Norris, Hannan, and Martin), and District Judge Dawson regarding the exculpatory and favorable evidence the SEC's Judicial Admissions (¶¶30, 31, and 33), (Ex. at 22-23) in the 0831 complaint (which pled the United States out of court in 0831 and conversely, pled the United States out of court in 1115 and 1224), Brady (exculpatory) evidence and Giglio (impeachment) evidence.

¶22

The Barasch Bribe Order (Ex. at 32-36) was entered by Judge Pauley while colluding and conspiring with the SEC, the USAO, and Judge Dawson, to suppress the exculpatory and favorable SEC Brady Email sent to alleged 1115 co-defendant Jeremy Jones (who allegedly pled guilty to the indictment pretrial, however there are no records of Jones' purported guilty plea in the court's files) by SEC lawyer Norris informing Jones as follows regarding any conspiracy regarding INZS:

"Mr. Jones you were not added to the SEC's Las Vegas litigation because the SEC believed your sworn SEC deposition testimony that you and the employees (Epps, Williams, Sadler, and Jackson, the "Gov't Stooges") 'were not involved in any conspiracy with Mr. Ware [because there was no conspiracy], and would not have participated had you known.' (emphasis added).

Mr. Jones keep your contact information current in the event the Commission needs to talk to you again. I am sure Mr. Ware will contact you seeking your assistance." (the "SEC Brady Email").

¶23

The SEC Brady Email, which was suppressed by the Barasch Bribe Order was material evidence -- which if disclosed to Mr. Ware before or during trial, the Gov't Stooges' known perjured testimony "they were part of a conspiracy" would have been directly impeached, their credibility seriously and irreparably vitiated, i.e., the jury would have surely wanted to know why the SEC's Lawyer believed the Gov't Stooges and did not add them to the SEC's Las Vegas litigation' yet the USAO did not believe their sworn SEC deposition testimony -- the case would have been placed "in a different light."

The SEC Brady email was material. Had the Brady evidence been properly and timely disclosed to Mr. Ware as required by the May 19, 2007, Dkt. 17. Tr. 5-9 Brady order (Pauley, J.),

Mr. Ware would have argued to the jury and compelled the SEC lawyers involved in the commingled SEC-DOJ Las Vegas 03-0831 (D. NV) litigation, i.e., Spencer C. Barasch, Jeffrey B. Norris, John C. Martin, Steven Webster, Robert Hannan, and Steve Korotash, pursuant to the Sixth Amendment to given testimony in 05cr1115 (SDNY) why the SEC did not add the Gov't Stooges to the Las Vegas Litigation.

The Government's bogus and fraudulent conspiracy theory would have been completely impeached and discredited by the testimony of the five white SEC lawyers compared to the testimony of the Government's black, low-life, uneducated trial witnesses which the Government's lawyers, AUSAs Alexander H. Southwell, Steven D. Feldman, Nicholas S. Goldin, and Michael J. Garcia, instructed to commit perjury which was suborned by the Government's lawyers and Judge William H. Pauley, III as an overt act in the racially-motivated retaliatory hate crime conspiracy¹ perpetrated against defendant Atlanta, GA lawyer Ulysses T. Ware.



/s/ Ulysses T. Ware

June 30, 2021

¹ The retaliatory racially-motivated hate-crime conspiracy was directed towards Mr. Ware, the securities counsel for GPMT, a publicly-traded company, because Mr. Ware refused to criminally violate the federal securities law and issue unlawful and fraudulent Rule 144(k) legal opinions to Judge Pauley and Judge Sand's clients, the plaintiffs in 02cv2219 (SDNY), 15 USC 77b(a)(11) statutory underwriters and according to FINRA, unregistered broker-dealers, ineligible for Rule 144. Judge Pauley, Judge Sand, and the USAO retaliated against Mr. Ware for refusing to enable Alpha Capital, AG, et al. to conduct an illegal unregistered public offering of GPMT's unregistered securities.

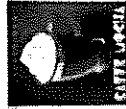
Proof of Mailing



Offices of Ulysses T. Ware
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Brooklyn, NY 11226

Mailed on June 30, 2021
US v. Ware, 04cr1224 and 05cr1115
RE: Undisclosed material Brady exculpatory evidence

Office of the District Clerk (Criminal Filing) (#31)
U.S. District Court (SDNY)
U.S. Courthouse
500 Pearl St.
New York, NY 10007



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The Hon. Merrick Garland
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Ave.
Washington, D.C. 20530
Re: U.S. v. Ware, 05cr1115 (SDNY), Dkt. #250.

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